

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No.: 22-20609-Civ-SCOLA

MICHEL KUMBAZ KILZI,

Plaintiff,

v.

ALL SMOOTH LAWN MAINTENANCE &  
LANDSCAPING, INC., a Florida profit  
corporation D/B/A ALL SMOOTH LAWN MAINTENANCE  
& LANDSCAPING, and ISMAEL GARCIA, individually,

Defendants.

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**PLAINTIFF'S MOTION FOR DEFAULT AGAINST DEFENDANTS**

Plaintiff, MICHAEL KUMBAZ KILZI, by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure 55 and 12(a)(4)(A) moves for entry of a default by clerk against Defendants, ALL SMOOTH LAWN MAINTENANCE & LANDSCAPING, INC., D/B/A ALL SMOOTH LAWN MAINTENANCE & LANDSCAPING a Florida Profit Corporation, and ISMAEL GARCIA, for failure to timely serve an answer in the above-styled cause of action.

Defendants were served on March 1, 2022 (ECF Nos. 5 and 6). Undersigned counsel certifies that as of the date of this filing, no paper or answer or other pleading has been served upon Plaintiff or Plaintiff's counsel on behalf of the Defendants.

Dated: March 23, 2022

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 23, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/Nathaly Saavedra  
Nathaly Saavedra, Esq.

**SERVICE LIST**  
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SOUTHERN DISTRICT OF FLORIDA  
Case No.: 22-20609-Civ-SCOLA

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Attorney for Plaintiff

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Defendant

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